

EXHIBIT 2

**UNREDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO TRUCKING
LLC,

Defendants.

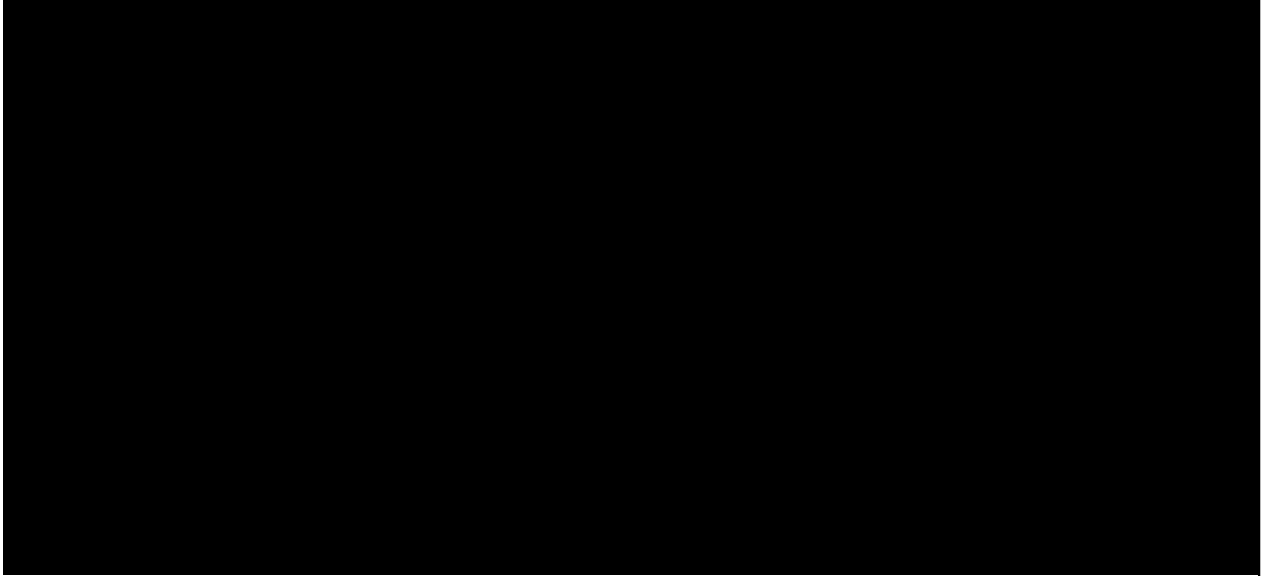
Case No. 17-cv-00939-WHA

**PLAINTIFF’S LIST OF ASSERTED
TRADE SECRETS PURSUANT TO CAL.
CODE CIV. PROC. SECTION 2019.210**

DOCUMENT FILED UNDER SEAL

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- [REDACTED]
presentation that was among files downloaded by Anthony Levandowski in January 2016. This presentation includes [REDACTED]
reproduced below:



(Ex. 13 at 29.) [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- *See supra*, ¶ 9, second bullet for reasonable steps taken to maintain secrecy.
- The trade secret claimed is [REDACTED]
[REDACTED] (Ex. 13 at 29).

85. [REDACTED] (Ex. 14).

- This Excel spreadsheet was included among files downloaded by Anthony Levandowski in January 2016. This confidential document contains detailed technical information about [REDACTED] This information derives value from not being generally known to the public or to competitors

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1 because it is important information for a competitor seeking to replicate what Waymo
2 was doing and where it hoped to get. Such information includes [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

- 12 • *See supra*, ¶ 9, second bullet for reasonable steps taken to maintain secrecy.
- 13 • The trade secret claimed is the information contained in the [REDACTED]

14 [REDACTED]

15 86. [REDACTED] (Ex. 15).

- 16 • This document was included among files downloaded by Anthony Levandowski in
17 January 2016. This confidential document contains [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

- 24 • *See supra*, ¶ 9, second bullet for reasonable steps taken to maintain secrecy.
- 25 • The trade secret claimed is [REDACTED]

26 [REDACTED]

27 87. [REDACTED] (Ex. 16).

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- 1 • The trade secret claimed is [REDACTED]
2 [REDACTED]
3 107. [REDACTED]
4 [REDACTED]
5 • These schematics were included among files downloaded by Anthony Levandowski on
6 December 11, 2015 from Waymo’s SVN schematic repository folders
7 [REDACTED] These schematics derive economic value from not being generally
8 known to the public or to competitors because they contain extensive details regarding
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 • *See supra*, ¶ 94, second bullet for reasonable steps taken to maintain secrecy.
15 • The trade secret claimed is [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 • These schematics were included among files downloaded by Anthony Levandowski on
19 December 11, 2015 from Waymo’s SVN schematic repository folders [REDACTED]
20 These schematics derive economic value from not being generally known to the public or
21 to competitors because they contain [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 • *See supra*, ¶ 94, second bullet for reasonable steps taken to maintain secrecy.
28 • The trade secret claimed is [REDACTED]

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109.

- Anthony Levandowski downloaded over 14,000 PCB design files on December 11, 2015 from Waymo’s SVN schematic repository, covering each and every project developed at Waymo. These confidential design schematics

- *See supra*, ¶ 94, second bullet for reasonable steps taken to maintain secrecy.

- The trade secret claimed is

J. Waymo’s LiDAR System Design Know-How, Including Accumulated Knowledge About Failed Designs

110.

- One LiDAR design Waymo explored derives economic value from not being generally known to the public or to competitors because it reflects significant time and effort spent by Waymo pursuing the